

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	
Plaintiff,	:	Case No. 2:19-CR-202
v.	:	Judge Michael H. Watson
THOMAS ROMANO,	:	
Defendant.	:	

MOTION FOR CONTINUANCE

Defendant, through undersigned counsel, respectfully moves the Court for an Order continuing the trial currently set in the instant case. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully Submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

MEMORANDUM

This matter is currently set for trial at 9:00 a.m. on July 26, 2021. The government recently provided Defendant with additional supplemental discovery which requires extensive review. Additionally, Defendant's retained expert requires additional time to finalize his report. Defense Counsel also requires additional time to review the same, as he has been engaged in several jury trials over the past month.

In light of these circumstances, Defendant respectfully moves the Court for a continuance of Defendant's trial until November, 2021. Counsel for Defendant has discussed this request with Assistant United States Attorney Christopher Jason, who agrees with the requested continuance. Counsel for Defendant submits that this request is not made for the purpose of needlessly delaying the resolution of this matter and is in the interest of justice.

Respectfully submitted,

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Christopher Jason, Assistant United States Attorney, 303 Marconi Blvd., Suite 200, Columbus, Ohio 43215, on July 7, 2021.

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY